

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

RECEIVED

UNITED STATES DISTRICT COURT

for the

MAY 27 2025

District of _____

Division

AT 8:30 _____ M
CLERK, U.S. DISTRICT COURT - DNJ

Case No.

(to be filled in by the Clerk's Office)

Victor Moore

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-V-

Warden Ellis D.A. Parish

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Address

County

Telephone Number

E-Mail Address

Victor Moore #0561199
 Mercer County Correctional Center P.O. Box 8068
 Trenton N.J. 08650
City State Zip Code

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

Warden Ellis
 Warden
 M.C.C.C. P.O. Box 8068
 Trenton N.J. 08650
City State Zip Code

☐ Individual capacity ☐ Official capacity

Defendant No. 2

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

O.A. Parish
 O.A.
 M.C.C.C. P.O. Box 8068
 Trenton N.J. 08650
City State Zip Code

☐ Individual capacity ☐ Official capacity

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Defendant No. 3

Name

Job or Title (if known)

Address

OFFices LAND

OFFices

M.C.C.C. P.O. Box 8668

Trenton

City

N.J.

State

08656

Zip Code

County

Telephone Number

E-Mail Address (if known)

☐ Individual capacity☐ Official capacity

Defendant No. 4

Name

Job or Title (if known)

Address

City

State

Zip Code

County

Telephone Number

E-Mail Address (if known)

☐ Individual capacity☐ Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐ Federal officials (a *Bivens* claim)☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

My INmate right is being Violated ① 10A:31-15-2 - INmate Law Library
 ② 10A:31-123 - Laundry Services ③ 10A:31-115 - control of vermin and Pests
 Negligence

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

NA

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

M.C.C.C. P.O. Box 8068 Trenton N.J 08650

- B. What date and approximate time did the events giving rise to your claim(s) occur?

March 24, 2024 we don't going to the Law Library and they don't wash are clothes or linen Laundry it is very sad I wash my clothes in the toilet? Control of Vermin and Pests it is Black mold

- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

I'm being violated my ① 10A:31-15-2 - Law Library

② 10A:31-123 - Laundry services

③ 10A:31-115 - control of Vermin and Pests

All Negligence

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IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

N.A

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

NEGLIGENCE

\$300,000,000.00
3,000,000.00

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

May 24, 2025

Signature of Plaintiff

Victor Moore

Printed Name of Plaintiff

*Victor Moore***B. For Attorneys**

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Address _____

*City*_____
*State*_____
Zip Code

Telephone Number _____

E-mail Address _____

Victor Moore # 0561199

Treton N-5 08650

My Inmate right is being Violated and
Negligence on the Jail to ME.

① 10A:31-15.2 - Inmate Law Library
(a) If the inmate law library is the selected
method in assisting inmates in the preparation
and filling of legal papers, the inmate
law library shall be so located as to enable
the inmates to be taken to the library to do
research. 10A:31-16.4 - Inmate Law
Library Violation and Sanctions.

② 10A:31-123 - Laundry Services (a)
Laundry services shall permit the exchange
or laundering of inmate clothing
(Facility issue and/or Personal)
linen, and bedding on a weekly basis.
Title 10A. Corrections chapter 31.
Adult county correctional Facilities
Subchapter 12. Inmate clothing and
Hygienic living conditions 10A:31-123
Laundry Services...

- ③ 10A:31-115-Control of Vermin and Pests
(a) staff at each adult county
correctional Facility shall make
arrangements for the control of
Vermin and Pests. (B) Licensed
pest control Professionals shall be
used at least once per Month to
clean or Fumigate the Facility.

Victor Moore
Victor Moore

May 24, 2025

M.C.C.C.
P.O. Box 8068
Trenton NJ 08650